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Nevada State Bar No. 13412

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA

SHANIA LIVERPOOL,

Plaintiff,

vs.

COAST TO COAST FINANCIAL  
SOLUTIONS, INC.,

Defendant

) Docket No.

) **COMPLAINT AND DEMAND FOR**  
) **TRIAL BY JURY**

Plaintiff Shania Liverpool ("Plaintiff") by and through his attorneys, The Law Offices of Robert M. Tzall as and for his Complaint against Defendant Coast to Coast Financial Solutions, Inc., ("Defendant") respectfully sets forth, complains and alleges, upon information and belief, the following:

**JURISDICTION AND VENUE**

1. The Court has jurisdiction over this matter pursuant to 28 U.S.C. § 1331, as well as 15 U.S.C. § 1692 *et seq.* and 28 U.S.C. § 2201.
2. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(b)(2).

- 1       3. Plaintiff brings this action for damages and declaratory and injunctive relief arising from  
2       the Defendant's violation(s) of 15 U.S.C. § 1692 *et seq.*, commonly known as the Fair  
3       Debt Collections Practices Act ("FDCPA").  
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5  
6                                   **PARTIES**

- 7       4. Plaintiff is a resident of the State of Nevada, residing in the County of Clark.  
8       5. Defendant is a "debt collector" as the phrase is defined in 15 U.S.C. § 1692(a)(6) and used  
9       in the FDCPA, with an address at 101 Hodencamp Rd., #120, Thousand Oaks, CA 91360.  
10

11                                   **FACTUAL ALLEGATIONS**

- 12       6. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though  
13       fully stated herein with the same force and effect as if the same were set forth at length  
14       herein.  
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16       7. On information and belief, on a date better known to Defendant, Defendant began  
17       collection activities on an alleged consumer debt from the Plaintiff ("Alleged Debt").  
18       8. The Alleged Debt was incurred as a financial obligation that was primarily for personal,  
19       family or household purposes and is therefore a "debt" as that term is defined by 15  
20       U.S.C. § 1692a(5).  
21  
22       9. On or around June 25, 2015, Defendant sent a letter (the "Letter") to Plaintiff, seeking  
23       collection of the Alleged Debt. Plaintiff received the Letter.  
24       10. The Letter included an online payment option, which applied a \$2.00 fee.  
25       11. The addition of the online payment fee is not expressly authorized by the agreement  
26       creating the Alleged Debt, nor is it otherwise permitted by law.  
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1 12. As a result of Defendant's improper debt collection practices described above, Plaintiff  
2 has been damaged.

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4 **FIRST CAUSE OF ACTION**  
5 **(Violations of the FDCPA)**

6 13. Plaintiff incorporates by reference all of the above paragraphs of this Complaint as though  
7 fully stated herein with the same force and effect as if the same were set forth at length  
8 herein.

9 14. Defendant's debt collection efforts attempted and/or directed towards Plaintiff violate  
10 various provisions of the FDCPA, including but not limited to 15 U.S.C. §§ 1692e,  
11 1692e(2)(B), 1692e(10), 1692f, and 1692f(1).

12 15. As a result of the Defendant's violations of the FDCPA, Plaintiff has been damaged and is  
13 entitled to damages in accordance with the FDCPA.  
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16 **DEMAND FOR TRIAL BY JURY**

17 16. Plaintiff demands and hereby respectfully requests a trial by jury for all claims and issues  
18 in this complaint to which Plaintiff is or may be entitled to a jury trial.  
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**PRAYER FOR RELIEF**

**WHEREFORE**, Plaintiff demands judgment from the Defendant as follows:

- a) For actual damages provided and pursuant to 15 U.S.C. § 1692k(a)(1);
- b) For statutory damages provided and pursuant to 15 U.S.C. § 1692k(a)(2)(A);
- c) For attorney fees and costs provided and pursuant to 15 U.S.C. § 1692k(a)(3); and
- d) For any such other and further relief, as well as further costs, expenses and disbursements of this action as this Court may deem just and proper.

DATED, this 31<sup>st</sup> day of March, 2016

/s/Robert M. Tzall

Robert M. Tzall

**The Law Offices of Robert M. Tzall**

*Attorneys for Plaintiff*